Radian International LLC - Master Subcontracting Plan 20 February 1998 - 20 February 2001

# RADIAN INTERNATIONAL LLC 8501 NORTH MOPAC BOULEVARD AUSTIN, TEXAS 78759

# MASTER SUBCONTRACTING PLAN

FOR

SMALL BUSINESS, SMALL DISADVANTAGED BUSINESS AND WOMAN OWNED BUSINESS

INCLUDING

HISTORICALLY BLACK COLLEGES AND UNIVERSITIES, MINORITY INSTITUTIONS

PERIOD COVERED: 20 FEBRUARY 1998 TO 20 FEBRUARY 2001

PREPARED BY: RICK W. MILLER

SIGNATURE:

TITLE: SMALL BUSINESS LIAISON OFFICER

DATE: 20 FEBRUARY 1998

approved by: donald M, careton

STONATION

TITLE: PRESIDENT AND CHIEF

EXECUTIVE OFFICER

DATE: 20 FEBRUARY 1998

APPROVED:

CAROLYN J. BROWN

ADMINISTRATIVE CONTRACTING OFFICER

DCMAO, RESIDENCY

AUSTIN, TEXAS

DATE: 98 Age 09

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# I INTRODUCTORY STATEMENT:

This plan reaffirms, through written procedure, the long-standing policy of Radian International LLC (hereinafter referred to as "Radian") of providing fair and equitable consideration of Small Business (SB), Small Disadvantaged Business (SDB), Women Owned Small Business (WOSB), or Rural Area Small Business (RASB) Concerns (as referenced in Federal solicitations) and Large Businesses (LB) as subcontractors during our performance of U.S. Government contracts. This Plan will ensure strict compliance with Public Laws 95-507, 99-661,100-180 and 100-656, along with the Federal Acquisition Regulations (FAR) and with other acts or regulations which relate to subcontracting with SB, SDB, WOSB and RASB Concerns. This Plan will also ensure the promulgation of opportunities for the encouragement of the utilization of the significant assets and resources available in Historically Black Colleges and Universities (HCBUs), and other Minority Institutions (MIs).

The term "Small Business Concerns" is used throughout this Plan to represent the collective SB/SDB/WOSB/RASB segments, per the FAR, that are addressed by a Government Request for Proposal (RFP). The term "SDB" throughout this Plan includes HBCUs and MIs as those terms are defined in FAR Supplement 226.7002. The term "subcontract" used herein includes Purchase Orders, Field Purchase Orders and subcontracting instruments as defined in FAR 44.101.

## II. STATEMENT OF POLICY:

The following policy statements apply to Radian's Master Subcontracting Plan:

- a. The enactment of Public Laws 95-507, 99-601, 100-180 and 100-656 and their incorporation within the FAR requires a strong commitment on our part to ensure that Small Business Concerns are considered fairly and equitably for all subcontracting opportunities during the performance of U. S. Government contracts.
- b. It is the continuing policy of Radian to afford the maximum practicable opportunity to Small Business Concerns to participate in the performance of all Radian contracts.
- c. One of the more effective means of practicing Radian's social commitment is by supporting economically disadvantaged businesses in their efforts to participate in the free enterprise system. With this in mind, we have established and implemented a Small Business Concerns Subcontracting Program intended to develop and implement appropriate procedures to take affirmative actions in seeking out, utilizing and assisting Small Business Concerns, not only in the performance of U.S. Government contracts, but in all of our procurement activities as well. We also are seeking opportunities to provide support, assistance and encouragement to HBCUs and to other MIs in their development of effective courses of instruction for business students.
- d. To be successful, this program requires not only the support of our Contracts and Procurement Departments, but the support of all functional groups of Radian. This holds true for any member of a Radian team who may work with our Purchasing and Contracting staffs during supplier selection and qualification, or simply in contacts and dealings with Radian suppliers and subcontractors. To this end, we expect that all personnel will be fully knowledgeable of the Public Laws and the FAR which pertain

to those very important programs, and that each Radian employee will take the necessary actions to comply with those directives and with the policies and procedures of this plan.

e. We intend this to be an on-going effort, involving all Radian personnel and encompassing the cited U.S. Government directives and Radian policies and those that may be announced in the future. Our Procurement personnel have been directed to maintain current and adequate policies and procedures as required to implement and to supplement this plan. These responsibilities include maintenance of a management reporting system which ensures that Management is informed, at least monthly, on the status of our accomplishment relative to subcontracting with Small Business Concerns.

# III. DISSEMINATION OF POLICY:

The Radian policy concerning subcontracting with Small Business Concerns shall be accorded full internal and external dissemination.

#### a. Internal Dissemination:

- 1. A written statement of the Radian subcontracting policy shall be included in the Radian Procurement Manual.
- 2. Various company publications shall include statements of our desire and intent to subcontract Small Business Concerns.
- 3. Company policy will continue to be emphasized to supervisors during meetings and at other opportune times. Managers in Contracting, Procurement and Project Management will be informed that their own performance appraisals will include consideration of their efforts in regard to the Radian stated policies regarding the utilization of Small Business Concerns.
- 4. Radian's Procurement and Contracts Manager will continue to stress company utilization of Small Business Concerns in meetings with the Procurement and Contracts Staff and in staff training criteria.
- 5. Radian Project Managers will be encouraged to remain actively aware of opportunities within their programs which would lend themselves to utilization of Small Business Concerns and to foster such utilization within their own staff and with the Procurement and Contracts staff.

### b. External Dissemination:

- 1. Requests for Quotations (RFQs), solicitations, purchase orders and subcontracts shall contain all required clauses and notices to ensure dissemination of the U.S. Government's policies regarding subcontracting with Small Business Concerns.
- 2. During daily contacts with various vendors, Radian Procurement personnel will emphasize the requirement to fairly consider Small Business Concerns as potential "second tier or below" subcontracts.

3. Suppliers will continue to be monitored to ensure compliance with contractual requirements regarding support of Public Law 95-507, 99-661, 100-80 and 100-656.

# IV. <u>ESTABLISHMENT OF GOALS:</u>

Radian has established business goals for subcontracting with Small Business Concerns based on the following:

- a. Subcontracting goals for Small Business Concerns are established by each applicable Government contract, as required by regulations, and such goals are transmitted to the respective agencies as an Addendum (Addendum 2) to this plan.
- b. Goals for Small Business Concerns shall be developed in accordance with Public Law 99-661. Those goals shall include, at a minimum, a designated five percent (5%) target for Small Disadvantaged Business and Women Owned Business Concerns, or, if circumstances warrant, an explanation as to why such a goal is not considered feasible.
- c. In accordance with Public Law and the FAR, every attempt shall be made to contact HBCUs and MIs when Radian has a need to make an award in research or studies. A record shall be retained of such contacts.
- d. Based on prior Radian experience and our review of current programs, Radian has established the following goals for subcontracting with Small Business Concerns for CY 98-01:

<ul> <li>Awards to Small Business Concerns</li> </ul>	50%
(PERCENT OF TOTAL DOLLARS SUBCONTRACTED)	
<ul> <li>Awards to Small Disadvantaged Business Concerns</li> </ul>	07%
(PERCENT OF TOTAL DOLLARS SUBCONTRACTED)	
<ul> <li>Awards to Woman-Owned Small Business Concerns</li> </ul>	05%

(PERCENT OF TOTAL DOLLARS SUBCONTRACTED)

# V. PLANS FOR THE IMPLEMENTATION OF THE SMALL BUSINESS CONCERNS PROGRAM

There is a Small Business Liaison Officer (SBLO) at Radian for Small Business Concerns who as Administrator of this Plan shall:

- a. Make a continuing effort to enlarge the list of Small Business Concerns contained in the Radian Vendor File.
- b. Review and revise, as necessary, the Radian Procurement Manual to ensure compliance with this Plan and with Public Laws 95-507, 99-661, 100-80 and 100-656, as implemented by the FAR.

- c. Support and attend Small Business Administration (SBA) sponsored seminars and Federal procurement conferences.
- d. Periodically review and advise the Radian staff on any changes in Government policies that affect Radian's participation in the Small Business Concern programs.
- e. Locate and render assistance to Small Disadvantaged Business Concerns, to the fullest extent possible and consistent with good business practices, governing regulations and directives and efficient corporate performance. Such assistance might include arranging solicitations, extending time of preparation of quotations, providing proposal assistance, adjusting quantities, specifications and delivery schedules to facilitate participation by such concerns, arranging for technical assistance, providing technical points of contact for business development purposes, assisting with cash flow concerns and providing detailed debriefs of proposal results as a learning experience for future proposals.
- f. Include Small Business Concerns considerations in all staff meetings, staff training criteria and emphasize both Government and Radian policies, as they relate to Small Business Concerns.
- g. Ensure that the required clauses covering Small Business Concerns are included, as appropriate, in solicitations, purchase orders and subcontracts.
- h. Develop goals for procurement awards to Small Business Concerns, consistent with the intent of Public Laws 95-507, 99-661, 100-80 and 100-656 and the FAR.
- i. Ensure the maintenance and submission of reports (e.g., SF294 and SF295 "Subcontracting Report for Individual Contracts" and Summary Subcontract Report", respectively) required of Radian and its applicable subcontractors by the FAR and/or by the pertinent contract involved.
- j. Ensure full cooperation in any studies or surveys (including subcontractor participation as necessary), as may be required/requested by the Government.
- k. Maintain appropriate records covering Vendor Files, surveys and awards pertaining to Small Business Concerns and submit appropriate reports to the President and Chief Executive Officer of Radian regarding Small Business Concerns.
- l. Counsel with and discuss subcontracting opportunities with representatives of Small Business Concerns, as may be referred to Radian by representatives of the SBA.
- m. Ensure that all subcontractors who receive subcontracts in excess of \$500,000 (\$1,000,000 for construction of any public facilities) submit a Subcontracting Plan that meets the requirements of FAR 52.219-9 "Small Business and Small Disadvantaged Business Subcontracting Plan".
- n. Include in all applicable subcontracts the FAR clause 52.219-8 "Utilization of Small Business Concerns and Small Disadvantaged Business Concerns" which is contained in the U.S. Government contract/subcontract to Radian.

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- o. Perform periodic audits of Radian subcontractors to measure progress against subcontract plans submitted by said subcontractors.
- p. Withhold the award of subcontracts requiring submission of a Subcontracting Plan pending the receipt of an acceptable plan in compliance with the specific FAR provisions cited in the Radian contract/subcontract.

## VI. ASSIGNMENT OF RESPONSIBILITES:

The following individuals have the responsibility for ensuring compliance with and for administering the plan:

Rick W. Miller Small Business Liaison Officer 8501 North Mopac Boulevard Post Office Box 201088 Telephone: (512)419-5223 FAX: (512)454-8232

E-MAIL: rick\_miller@radian.com

and

Marianna H. Sulser Small Business Liaison Officer Telephone: (512)419-5692 FAX: (512)454-8232

E-MAIL: marianna\_sulser@radian.com

## VII. REQUIRED RECORDS AND REPORTS:

The following is a summary of the records that will be maintained within Radian and reports that will be prepared and submitted to Management and/or Government agencies:

- a. Records that will be maintained by Radian are:
  - 1. Small Business Concern source lists.
  - 2. A listing of organizations and agencies contacted for source information on Small Business Concerns.
  - 3. A listing of attended Small Business meetings, conferences, seminars and trade-fairs.
  - 4. Records of procurements, over \$10,000, indicating if Small Business Concerns were solicited and, if not, why not and the reasons for the failure of any responding SB/SDB/WOB to receive the award.
  - 5. In accordance with FAR 52,219-9, records will be maintained to support award data submitted by Radian to the Government, including the name, address and business size of each subcontractor.

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- Records of procurements, over \$10,000, indicating if Small Business Concerns were solicited and, if not, why not and the reasons for the failure of any responding SB/SDB/WOB to receive the award.
- In accordance with FAR 52,219-9, records will be maintained to support award data submitted by Radian to the Government, including the name, address and business size of each subcontractor.

Radian will also provide adequate and timely consideration of the potential of Small Business Concerns in all "make-or-buy" decisions.

- Reports that will be prepared are:
  - Number and value of purchase orders placed each quarter, indicating the amounts purchased from Small Business, Small Disadvantages Business, Women Owned Business and Large Business.
  - A year-to-date value of purchase orders issued, indicating the amounts purchased from Small Business, Small Disadvantaged Business, Women Owned Business and Large Business.
  - 3. A listing of all approved, active Vendors, indicating business size.
  - Standard Forms 294 and 295 will be completed and submitted in accordance with current directives and FAR 52-219-9.

Submittal Due Dates will be as follows:

25 April

25 October

# VIII. CERTIFICATE OF COMPLIANCE:

We, the undersigned, do herewith assure that we will include the clause entitled "Utilization of Small Business, Small Disadvantaged Business and Women Owned Business Concerns" in all purchase orders/subcontracts which offer further subcontracting opportunities. Additionally, we will require subcontractors (except Small Business concerns) who receive purchase orders/subcontracts in excess of \$500,000.00, or in the case of a contract for the construction of any public facility equal to or exceeding \$1,000,000, to adopt a plan in accordance with applicable Public Laws and the FAR.

Donald M. Carlton

President and Chief Executive Officer

NAME:

Rick W. Miller

Small Business Liaison Officer

#### **ADDENDUM I**

# OUTREACH PROGRAMS: SMALL BUSINESS, SMALL DISADVANTAGED BUSINESS and WOMAN OWNED BUSINESS

# MASTER SUBCONTRACTING PLAN RADIAN INTERNATIONAL LLC

- 1. The continuing efforts of Radian International LLC (Radian), in support of both the Corporation and the U. S. Government's policies concerning the utilization of Small Business, Small Disadvantaged Business and Woman Owned Business has, in the past, proven to be quite successful. Radian has consistently shown positive trends in total contract award percentages to SB/SDB/WOB firms, averaging more than fifty- five percent (55%) of total contracts awarded, which is well in excess of those percentages required by Public Law and/or the Federal Procurement Regulations. Those initiatives are the result of a concerted "Team Effort" on the part of the entire Radian staff to recognize the needs of Small Business and to take aggressive action, where ever possible, to encourage and assist Small Business firms in fully participating in the competition of the free marketplace.
- 2. Radian is also working to develop additional opportunities for increased participation by Small Disadvantaged Business and Woman Owned firms. The Radian Vendor List encompasses the entire United States. The expansion of the Radian Business System (RBS) to satellite offices and the increased emphasis and training on placing Purchase Orders, Field Purchase Orders and Procurement Card activities with SB/SDB/WOB Concerns have yielded significant benefits. We are planning to increase our outreach to Small Business, Woman Owned Business and to Historically Black Colleges and Universities and to other Minority Institutions, to the maximum extent that our resources will permit. Our CY98-01 goals include:
  - a. Continuing to refine our Vendor List to reduce the total number of approved vendors while increasing the number of Small Business, Small Disadvantaged Business and Woman Owned firms that are included in our approved Vendor List. Our goal will be to increase both categories of approved vendors by 15%.
  - b. Increasing staff participation in Small Business seminars, conferences and trade fairs. Our goal will be to have a member of the Purchasing Office staff attend at least five (5) SBA or Department of Defense (DoD) sponsored Small Business functions each year during the years 1998-01.
  - c. Radian shall also increase its internal dissemination of information to the Radian staff, using periodic status reports and management level meetings to provide additional data regarding the Radian SB/SDB/WOBP and how well we are doing in meeting our SB/SDB/WOBP goals and objectives.
- 3. Radian staff members will be encouraged to offer suggestions regarding ways and means for Radian to increase its support and utilization of Small Business, Small Disadvantaged Business and Woman Owned Business firms. Radian staff members will also be encouraged to provide added support at all levels of education, to foster improved educational goals, especially for minority students and to assist students in the

identification of various career opportunities in industry. As resources permit, Radian will develop a cadre of mid-level and senior level managers who can offer special presentations to interested Colleges and Universities.

- 4. Subcontractors will be requested to submit periodic reports and cooperate in any studies and surveys as may be required by the contracting agency or U.S. Small Business Administration in order to determine the extent of compliance by the subcontractor with Radian's Subcontracting Plan.
- 5. Radian subcontractors with subcontracts valued greater than \$500,000 value are required to submit Standard Form (SF) 294, "Subcontracting Report for Individual Contracts" and SF 295, "Summary Subcontract Report," in accordance with the instructions on the forms.
- 6. Render assistance to Small Business, Small Disadvantaged Business and Woman Owned Businesses to the fullest extent possible and consistent with good business practices, governing regulations and directives and efficient corporate performance. Such assistance might include arranging solicitations, extending time of preparation of quotations, providing proposal assistance, adjusting quantities, specifications and delivery schedules to facilitate participation by such concerns, arranging for technical assistance, providing technical points of contact for business development purposes, assisting with cash flow concerns and providing detailed debriefs of proposal results as a learning experience for future proposals.
- 7. Where the lists of potential Small, Small Disadvantaged, and Women-Owned Small Businesses are excessively long, reasonable effort will be made to give all such concerns an opportunity to compete over time.
- 8. Provide adequate and timely consideration of the potentialities potential Small, Small Disadvantaged, and Women-Owned Small Business Concerns on all "make-or-buy" decisions.
- 9. Counsel and discuss subcontracting opportunities with representatives of potential Small, Small Disadvantaged, and Women-Owned Small Businesses.
- 10. Provide notice to subcontractors concerning the penalties and remedies for misrepresentation of business status as Small, Small Disadvantaged, or Women-Owned Small Business for the purpose of obtaining a subcontract that is included as all or part of a goal contained in a Radian Subcontracting Plan.
- 11. Ensure compliance with Company policies and procedures and applicable Federal regulations to implement the requirements of this Subcontracting Plan.
- 12. Quarterly review by management of progress made against SB/SDB/WOSB goals and requirements established by all Subcontracting Plans.
- 13. Review solicitations to remove statements, clauses, etc., which may tend to restrict or prohibit SB/SDB/WOB participation.
- 14. Ensuring periodic rotation of potential subcontractors on bidders lists.
- 15. Conducting or arranging for conduct of motivational training for Procurement personnel to the intent of Public Law 95-507.

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- 16. Establish contacts and maintain outreach records for contacts with Minority and Small Business trade associations, business development organizations and conducting interviews with SB/SDB/WOSB/HCBU/MI firms and organizations.
- 17. Establish outreach efforts for Industries for the Blind and the Severely Handicapped.
- 18. Monitor attainment of proposed goals and take corrective action(s) as necessary.
- 19. Conduct networking with the SBA and other DoD contractors as necessary to share, investigate or develop new SB/SDB/WOSB Business Concerns.
- 20. Pursue and develop mentor-protégé programs when technology and cost parameters coincide and permit.

#### **ADDENDUM 2**

# SMALL BUSINESS, SMALL DISADVANTAGED BUSINESS AND WOMAN OWNED BUSINESS SUBCONTRACTING GOALS

#### MASTER SUBCONTRACTING PLAN

DATE: April 2, 1999

CONTRACTOR: RADIAN INTERNATIONAL LLC

ADDRESS: 8501 North Mopac Boulevard

Austin, Texas 78759 P.O. Box 201088

Austin, Texas 78720-1088

SOLICITATION/CONTRACT NUMBER: F44650-98-R-0010

ITEM/SERVICE: Environmental Compliance and

Analysis Services to Air Combat Command

Langley AFB, VA

1. The following, together with the basic Master Subcontracting Plan for Small Business and Small Disadvantaged Business, is hereby submitted to satisfy the applicable requirements of FAR 52.219-9.

- 2. The percentage goals (expressed in terms of the percentage of the total planned subcontracting dollar) are applicable to the contract cited above, or to the contract awarded under the solicitation cited.
  - a. Small Business (SB) concerns: 50% of total planned subcontracting dollars under this contract will be targeted for award to subcontractors who are Small Business concerns.
  - b. Small Disadvantaged Business Concerns: 7% of the total planned subcontracting dollars under this contract will be targeted for award to subcontractors who are Small Business Concerns owned or controlled by socially and economically disadvantaged individuals. This **percentage is included in the percentage given in paragraph 2.a., above.**
  - c. Woman Owned Business concerns: 5% of the total planned subcontracting dollars under this contract will be targeted for award to subcontractors who are Woman Owned Business concerns. This percentage is included in the percentage given in paragraph 2.a., above.

- 3. The following values correspond to the percentage goals shown above:
  - a. Total dollars planned to be subcontracted to Small Business Concerns: **\$To Be Determined on a Delivery Order Basis.**
  - b. Total dollars planned to be subcontracted to Small Disadvantaged Business Concerns and which are included in the preceding paragraph are: \$ To Be Determined on a Delivery Order Basis.
  - c. Total dollars planned to be subcontracted to Woman Owned Business Concerns and which are included in the preceding paragraph a. are: \$ To Be Determined on a Delivery Order Basis.
  - d. The total estimated dollar value of all planned subcontracting, to all types of business concerns under this contract will be: **\$ To Be Determined on a Delivery Order Basis.**
- 4. The following principal products and/or services will be contracted under this contract, and the targeted distribution, among Small Business, Small Disadvantaged Business and Woman Owned Business Concerns will be as follows:

Aerial Photography/Interpretation

Radon Survey

Asbestos Survey

Lead-based Paint Survey

Sanitary Sewer System Infiltration/Inflow Studies

**Smoke Testing** 

**Television Inspection of Pipes** 

Laboratory Support (Specific Certifications not held by Radian)

Printing Brochures, Pamphlets, etc. for Pollution Prevention Program

Promotional Items for Pollution Prevention Program

Environmental Conference Support (Vendors for On-site Services)

Natural and Cultural Resource Studies

**Biological Inventories** 

Team Subcontracts Services to be provided

Geo-Marine GIS, Environmental Baseline Surveys, Biological Inventories, Natural and

**Cultural Resource Studies** 

Cape Environmental UST/AST Studies, Asbestos Survey, Lead-based Paint Survey

Wyle Laboratories Noise Abatement

note: our team subcontractors qualify as either a small business or large business depending on the applicable SIC code.

#### 5. Recent and future outreach efforts include:

#### Dec 10 -12 San Antonio, Texas

South Central Regional Council for Small Business Education & Advocacy (DOD)

14 Hours of Continuing Education Training. Marianna Sulser was a panel member and guest speaker on Radian's Small Business Program

## Feb. 20 Austin, Texas

MBE Business Opportunity Trade Fair

Lower Colorado River Authority & Central & South Texas Minority Business Council Radian participated with a booth

#### Mar. 1 Austin, Texas (Radian)

Radian Internal Training Class on Subcontracting with Small Business

Taught by Marianna Sulser, SBLO

#### Mar. 5 Austin, Texas

Austin Chapter of NMPA's Central Region

1-Day Workshop for Property, Program & Contracting Professionals Involved in the Implementation or Management of a Property Control System Radian participated in hosting and there was a module on DCMC Small Business by Jimmy Heston (DCMC San Antonio)

#### Mar. 11 San Antonio, Texas

DCMC (DOD) Training on Electronic Filing of the SF295

#### Mar. 16 Austin, Texas

National Contract Management Association

Marianna Sulser Guest Speaker on Small Business Changes at Monthly Meeting

#### Mar. 17 & 18 Houston, Texas

U.S. Small Business Administration & Minority Business Enterprise Legal Defense and Education Fund 2-Day Program - National Small Disadvantaged Business Briefing Sessions

Radian was active participant

#### April 8 Arlington, Texas

U.S. Small Business Administration, Washington D.C. & U.S.

Small Business Administration, Dallas District Office National SDB Program Outreach Briefing Radian was active participant

## May 10 Colorado Springs, Colorado

North Central & Pacific Northwest & South Central Regionsl

Councils for Small Business Education and Advocacy Training Conference (DOD)

#### May 11 Philadelphia, Pennsylvania

U.S. Army Corps of Engineers, North Atlantic Division Small Business Conference Radian will have a booth

## May 21 Austin, Texas (Radian)

Radian International to Host a PRO-Net Demonstration with the Electronic Commerce Resource Center Highly advertised by the ECRC and Radian International LLC

# May 24 RTP, North Carolina

Marketplace '99: Procurement Opportunities for Small Businesses

In cooperation with: Environmental Protection Agency, National Contract

Management Association, NC Small Business and Technology Development Center - PTAC, National Institute of Environmental Health Sciences. Radian will have a booth.

# June 3 Austin, Texas (Radian)

Radian & The ECRC Small Business Training Session on Electronic Commerce Conducted by the San Antonio/Austin ECRC

June (last week -date being firmed) Austin, Texas (Radian)

Radian & The Central & South Texas Minority Business Council to Sponsor- Small Business Trade Fair

# Aug 26 Houston, Texas

Houston Minority Business Council EXPO '99

Radian will have a booth

#### Sept. 9 Austin, Texas (Radian)

Radian Internal Training Class

Subcontracting with Small Business Taught by Marianna Sulser, SBLO

6. Indirect costs are included in our SF 295 reporting and were considered in establishing our goals.